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## YOLO COUNTY FARM BUREAU

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July 1, 1998

CALFED Bay Delta Program  
Attn: Rick Breitenbach  
1416 Ninth Street  
Suite 1155  
Sacramento, CA 95814

Faxed July 1, 1998 (916) 654-9780

Subject: Comments of the Draft Programmatic Environmental Impact  
Statement/Environmental Impact Report (EIS/EIR for the CALFED Bay Delta Program)

Dear Mr. Breitenbach,

Yolo County Farm Bureau is a general farm organization representing agriculture interests in Yolo County. We are also the largest representative of agriculture in Yolo County.

The Yolo County Farm Bureau's Position on the CALFED Proposal.

The CALFED Bay-Delta Program must recognize existing agricultural surface and ground water rights and area of origin rights, as well as existing contractual obligations of the state and federal governments. New water demands (for urban growth and environmental uses) must look to newly developed water supplies. The Yolo County Farm Bureau strongly objects to any effort to require agricultural water users to pay and additional costs to replace water taken for environmental uses through regulatory actions or for replacing water dedicated to environmental protection by legislative actions and the Bay-Delta Accord.

A primary benefit of the CALFED Program for agriculture is developed of an adequate, affordable and reliable water supply. Water reliability must be defined as the timely delivery of water to sustain crops. The Yolo County Farm Bureau does not accept the position of certain stakeholders that "less water delivered more often" is consistent with the CALFED solution principles.

The Yolo County Farm Bureau strongly asserts that additional water storage capacity must be part of CALFED's common programs rather than variable options.

Additional surface storage should be moved from variable options to the site of CALFED common programs. CALFED's storage proposals should directly address the effect of such storage options on water yield, power consumption versus power production, flood control benefits and opportunity for multiple benefits in the use of increased yield. CALFED should construct new surface storage in the Sacramento Valley, adjacent to the Delta and in the San Joaquin Valley. Groundwater management programs must be developed on the local level and supported by local affected groundwater users and communities; a "one-size-fits-all" approach will not work in all basins or sub-basins.

The Yolo County Farm Bureau opposes the widespread conversion of agricultural land and its associated water resources to other uses. While some locally driven, voluntary programs that address specific issues may have merit, widespread land retirement and/or conversion is unacceptable. Land retirement for demand reduction purposes was eliminated from further discussion at the end of Phase 1, and must remain "off the table."

CALFED should structure the Ecosystem Restoration Program to avoid, reduce or mitigate potential impacts to agricultural water and land resources. The program should develop an approach that emphasizes collaborative local projects with landowners. CALFED should assist local agencies in enhancing water quality through means other than land retirement. CALFED should also evaluate its common programs and give precedence to measures that maintain lands in private ownership and agricultural operations. In any event there should be no third party impacts.

The Yolo County Farm Bureau believes that California's water storage and conveyance capacity must be enhanced before water transfers can play a meaningful role in resolving statewide water management issues. CALFED must recognize that water transfers do not create "new" water; rather, transfers simply move water from one beneficial use to another. We support the inclusion of voluntary transfers and exchangers as a component of an integrated and balanced CALFED package.

The development of water markets should be left to stakeholders. CALFED's involvement in water transfers should be limited to construction of the necessary conveyance and storage facilities that will enable transfers to play a meaningful role in California's overall water management. CALFED should not seek to change the existing law regarding water transfers and should not adversely impact existing water rights or transfer programs, either directly or indirectly, through new regulations or controls.

The Yolo County Farm Bureau strongly asserts that improved conveyance is essential to meet the CALFED water supply reliability, water quality, flood control and fishery objectives. The Yolo County Farm Bureau maintains that the minor improvements identified in Alternative 1 are inadequate to meet these objectives. Further refinement and optimization of Alternative 2 and 3 are necessary to determine if each can accomplish acceptable levels of improvement. The Yolo County Farm Bureau also believes that such improvements are only effective if linked with additional storage.

CALFED must perform additional analysis to address the relative weakness associated with Alternatives 2 and 3, and try to optimize each of these alternatives to determine if each can accomplish acceptable levels of improvement in all solution areas. This analysis must include development of operating criteria and assurances that provide fishery protection, and address water supply reliability, in-Delta and export water quality, earthquake risk and flood control.

The Yolo County Farm Bureau supports revisions to the common programs in order to maintain land in private ownership and agricultural production. In addition, the common programs should provide incentives for landowners to participate in program objectives.

CALFED should revise its common program proposals to reduce, avoid or mitigate impacts on agricultural resources. Programmatically, CALFED should develop incentives for farmers, ranchers and other landowners to achieve CALFED objectives while maintaining the private ownership and economic productivity of agricultural land and water.

The Yolo County Farm Bureau supports CALFED's identification of the AB 3616 Agricultural Water Management Council as the appropriate vehicle for the continued voluntary implementation of efficient water management practices and opposes any mandatory requirements for agricultural water use efficiency.

CALFED should modify its Water Use Efficiency Technical Appendix to accurately reflect that California agriculture is already highly efficient in its use of water and that more efficient water application does not necessarily increase useable water supplies. CALFED should also delete references in its Water Use Efficiency Technical Appendix to water pricing and measurement, inconsistent with the AB 3616 MOU, as mandatory practices. CALFED also should delete reference to acreage approved water conservation plans prepared under US Bureau of Reclamation criteria. These should be accepted as meeting CALFED's water use efficiency standards.

Yolo County Farm Bureau is of the opinion that the current CALFED studies do not adequately address the issue of flood control. The current levy system is breaking down and CALFED has not put a sufficient degree of emphasis on this legitimate concern of the counties in the Bay Delta.

Yolo County borders Putah Creek and has Cache Creek flowing through the county. Both streams are extensively managed, Cache Creek particularly, for the benefit of Yolo County agriculture. The Yolo County Farm bureau does not want CALFED to interfere with the current system of water and environmental management of either stream.

In conclusion, CALFED will fail if it doesn't live up to its underlying promise, that everyone gets better together. Perhaps, realistically speaking, it is better to say that everyone suffer together. This means that not only must environmental goals be met, but that the needs of California farmers, industries and urban residents must also be addressed all at the same time.

Thank you for the opportunity to provide these comments. If you have any further questions, please do not hesitate to call me at (530) 662-6316.

Sincerely,

A handwritten signature in cursive script that reads "Blake Harlan".

Blake Harlan  
President

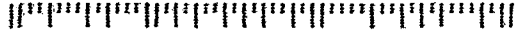


YOLO COUNTY FARM BUREAU

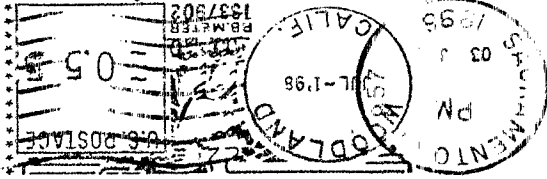
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